

Board of Pharmacy

Initial Statement of Reasons

Subject Matter of Proposed Regulation: Graduates of Foreign Pharmacy Schools

Sections Affected: 1720.1

Problem Addressed

Business and Professions Code section 4005 authorizes the Board of Pharmacy to establish and implement rules and regulations regarding the practice of pharmacy as may be necessary for proper and more effective enforcement and administration of the Pharmacy Act (Business and Professions Code section 4000 et seq).

Business and Professions Code section 4200 (a)(3) requires that any pharmacist applicant must have completed at least 150 semester units of collegiate study in the United States, or the equivalent thereof in a foreign country.

To ensure that this criterion is satisfied, the board evaluates the transcripts of graduates of foreign pharmacy schools by converting the coursework to the semester system used in the United States. To do this conversion, the board takes the number of hours of study completed for each course and divides it by the typical semester length of 15 weeks with laboratory and lecture units being treated differently. This conversion is very straightforward; however, it cannot be completed unless particular information specific to the hours and weeks of study at the particular college at the particular time the applicant was a student there is contained within the transcript or with the supporting syllabi.

There are additional problems. The board will only accept school documents directly from the school, Foreign Pharmacist Graduation Equivalency Committee or directly from a consulate that must first authenticate the documents. For some applicants whose education was earned in a war zone, in a school that has been destroyed or a country where the United States does not maintain diplomatic relations this is a problem.

Additionally, not all countries issue consistent transcripts. For example, many Middle Eastern countries issue mark sheets rather than transcripts. The mark sheets only contain the examination score earned, not the units completed, making the evaluation impossible to complete without a college record issued by the school. This further delays the application.

While the board feels that the current method used to evaluate transcripts is fair and equitable, a specialized foreign credential evaluation service that can authenticate, translate and or evaluate transcripts may be better suited to determine if the schooling completed satisfies the 150-semester unit requirement in certain circumstances where the information is otherwise not readily available and may be the only option for some applicants. The board will continue to review these materials for adequacy with statutory and regulatory requirements to take the board's licensure examination.

Specific Purpose of the Regulation

The specific purpose of this proposed amendment to the regulation is to allow the board to accept the findings of a foreign credentials evaluation service as evidence that an applicant has satisfied the collegiate equivalency required in Business and Professions Code section 4200(a)(3).

Factual Basis

The Board of Pharmacy has the responsibility to administer and enforce Pharmacy Law (Business and Professions Code Section 4000 et seq.) and adopt regulations for the proper and more effective enforcement and administration of the chapter pertaining to the practice of pharmacy (Business and Professions Code section 4005).

The board is charged with ensuring that only those applicants who are minimally qualified are issued a license to work as a pharmacist in California. To do this the board must verify that each applicant satisfies all of the requirements set forth in Business and Professions Code section 4200.

The board has determined that the amendment proposed in the regulatory action is necessary to ensure that all graduates of foreign pharmacy schools are afforded the opportunity to have their education evaluated by an agency specializing in such evaluations.

Underlying Data

None.

Business Impact

The board has not identified any impact on business.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

The board has not identified any equally effective alternatives that would lessen any adverse impact on private persons.